

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

WILLIAM E. JOHNSON, II,

Plaintiff,

v.

CIVIL ACTION NO. 2:11cv14

EXPERIAN INFORMATION SOLUTIONS, INC.

and

PORFOLIO RECOVERY ASSOCIATES, LLC,

Defendants.

MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

OF TIME TO DISCLOSE EXPERT

NOW COMES the Plaintiff William E. Johnson, II, by counsel, and for his Memorandum in Support of his Motion for Extension of Time to Disclose Expert states as follows:

1. Plaintiff has not yet been able to finalize arrangements with his intended expert and anticipates doing so on a daily basis.
2. The extension of time is not sought for delay purposes, but so that justice may be served.
3. Trial proceedings are in a very early stage.
4. No party will suffer prejudice as a result of this extension of time.
5. The extension of time will not cause any delay in the trial proceedings as no extension for any other discovery deadline is requested.
6. Counsel for the Defendants has no objection to the requested extension of time.

WHEREFORE, Plaintiff prays this Honorable Court grant his Motion for Extension of Time to Disclose Expert pursuant to Rule 26(a)2(A) from Monday, June 13, 2011, to on or before Tuesday, June 21, 2011.

WILLIAM E. JOHNSON, II

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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